

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

IN RE:	:	
	:	
CARL E. MCKEE	:	Chapter 13
Debtor(s)	:	
	:	
WILMINGTON SAVINGS FUND	:	Case Number: 1:19-bk-04521-HWV
SOCIETY, FSB, AS TRUSTEE OF	:	
STANWICH MORTGAGE LOAN	:	
TRUST	:	
Movant	:	
	:	
v.	:	
CARL E. MCKEE	:	
Debtor(s)	:	
JACK N. ZAHAROPOULOS	:	
Trustee	:	
Respondents	:	

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY AND CO-DEBTOR STAY WITH RESPECT
TO PROPERTY: 106 HIGHLAND AVENUE, DUNCANNON, PA 17020**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtor denies that the instant bankruptcy was filed to delay the state court proceedings in that Debtor has made more than four years' worth of payments into a repayment plan and is nearly completed with said payments.
9. Admitted.

10. Debtor lacks knowledge or information sufficient to form a belief about the truth of this allegation and therefore demands strict proof thereof.

11. Denied. Debtor denies that Movant is not adequately protected and is entitled to relief as Debtor has the ability to cure the arrears within a reasonable period of time.

12. Admitted in part and denied in part. Debtor admits that there was no equity in the property when the case was filed. Debtor denies the property is not necessary for an effective reorganization as Debtor utilizes the premises as his residence.

13. Admitted.

14. Admitted. Since Debtor is near completion of the Plan, he has no objection to such contact.

15. Admitted. Debtor admits that Movant makes certain requests within this paragraph but cannot answer to a hypothetical set of circumstances.

16. Admitted.

WHEREFORE, Debtor requests this Court to deny the relief requested by Movant and permit the parties to resolve this matter.

Respectfully submitted,

METTE, EVANS & WOODSIDE

By: /s/ James K. Jones
James K. Jones, Esquire
Supreme Court I.D. No. 39031
3401 N. Front Street
P.O. Box 5950
Harrisburg, PA 17110-0950
Phone: (717) 232-5000
Fax: (717) 236-1816

Date: April 24, 2024

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IN RE: :
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing **Debtor's Answer to Motion for Relief from Automatic Stay and Co-Debtor Stay with Respect to Property: 106 Highland Avenue, Duncannon, PA 17020**, in the above-captioned matter was sent via electronic mail and/or first-class U.S. Mail, postage prepaid on this date, to the following parties:

Daniel P. Jones, Esquire
Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Email: djones@sterneisenberg.com

Respectfully submitted,
METTE, EVANS & WOODSIDE

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